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Attorneys for Defendant Save On SP, LLC

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

<p>JOHNSON & JOHNSON HEALTH CARE SYSTEMS INC.,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>SAVE ON SP, LLC,</p> <p style="text-align: center;">Defendant.</p>	<p>Civil Action No. 22-2632 (ES)(CLW)</p> <p style="text-align: center;"><i>Document Electronically Filed</i></p> <p style="text-align: center;">Return Date: July 15, 2023</p> <p style="text-align: center;">NOTICE OF MOTION TO SEAL</p>
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PLEASE TAKE NOTICE on July 15, 2024, or a date and time to be set by the Court, Defendant Save On SP, LLC (“SaveOnSP”), by and through its attorneys Robinson & Cole, LLP and Selendy Gay, PLLC, shall move for the entry of an order, pursuant to Local Civil Rules 5.3(c) and 7.1, permanently sealing portions of the

- (a) Johnson and Johnson Health Care Systems, Inc.'s ("JJHCS") December 20, 2023 Status Letter and Exhibit 1 [collectively, ECF No. 287];
- (b) JJHCS's March 6, 2024 Motion to Compel regarding RFPs 99, 102, 103 and Exhibits 1-2, 6-9, 13; SaveOnSP's March 15, 2024 Opposition and Exhibit 1 [collectively, ECF No. 295]; and
- (c) JJHCS's March 13, 2024 Motion to Compel regarding RFPs 95 and 96 and Exhibits 2, 6-13, 15-17, 19; SaveOnSP's March 21, 2024 Opposition and Exhibits 1-2, 6-7, 10, 12; and JJHCS's March 25, 2024 Reply and Exhibits 20-24, 28-33 [collectively, ECF No. 298].

This Motion is timely pursuant to the motion for an extension of time granted by the Honorable Judge Wolfson on June 5, 2024. All parties consent to the relief sought in this motion. Pursuant to Local Civil Rule 7.1(d)(4), no legal brief is required because all relevant proposed findings of fact and conclusions of law required by Local Civil Rule 5.3(c)(3) have been set forth in the Declaration of E. Evans Wohlforth, Jr., Esq. submitted herewith.

PLEASE TAKE FURTHER NOTICE that, in support of the within motion, Defendant shall rely upon the Declaration of E. Evans Wohlforth, Jr., Esq., and upon the pleadings and all prior proceedings in the above-captioned action.

PLEASE TAKE FURTHER NOTICE that a copy of the proposed Findings of Fact and Conclusions of Law and Order Granting the Motion to Seal is submitted with this Notice.

PLEASE TAKE FURTHER NOTICE that a certificate attesting to the date and manner of service of these moving papers is submitted herewith.

Dated: June 18, 2024

By: s/ E. Evans Wohlforth, Jr.
E. Evans Wohlforth, Jr.

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